



National Planning Framework Team
The Scottish Government Planning Directorate
Victoria Quay
Leith
Edinburgh
EH6 6QQ

Your Ref

Our Ref
DE/C/SUT/21/8/

Date
15 April 2008

Dear Sir/Madam

Discussion Draft National Planning Framework 2

Thank you for the opportunity to comment on Draft NPF2. Please find below the comments of Defence Estates on behalf of the Ministry of Defence.

1) Paragraph 49 of NPF2 states:

'Defence facilities, such as air bases and the significant Defence Estate land holdings in and around Edinburgh and Inverness, on the West Coast and in the South-West make a significant contribution to the economy in parts of rural Scotland'.

Whilst the recognition to the Ministry of Defence land holdings is welcomed, Defence Estates considers that in relation to other major employers the MOD has had only minor recognition within the document. Defence Estates would welcome the opportunity to work with the Scottish Government to give due recognition to the MOD within NPF2 as a major landowner and employer within Scotland. In particular, Defence Estates considers that it would be appropriate to make reference to the areas of significant MOD activity within the Scotland Today, Scotland 2030 and Spatial Perspectives sections of NPF2. The broad areas of most significant MOD activity within Scotland could be considered to be:

- Clyde Naval Base
- Edinburgh, the Lothians and Fife
- Inverness and the Moray Coast
- Training Areas

2) Paragraph 172 of NPF2 identifies that the Government is reviewing its Scottish Planning Policy on Housing (SPP3).

Defence Estates would welcome the opportunity to participate in the review of this document. In particular, it should be noted that the equivalent English document, Planning Policy Statement 3: Housing, states in Annex C that Strategic Housing Market Assessments should consider future demographic trends and identify the accommodation requirements of specific groups and occupational groups such as operational defence personnel. As such, Defence Estates considers that it would be appropriate that the accommodation requirements of operational defence personnel are recognised with SPP3.

3) Numerous references are made within NPF2 to the proposed national development of the Rosyth International Container Terminal. In general terms the MOD supports this proposal.

Defence Estates considers that the Annex: National Developments – Statements of Need and other appropriate references within NPF2 should be amended to reflect the MOD presence at Rosyth and that the MOD would wish to work alongside the other lead organisations in realising Rosyth's full potential as an International Container Terminal.

Defence Estates would welcome the opportunity to work with the Scottish Government to address the matters raised above in sufficient detail and please do not hesitate to contact me should you require any additional information.

Yours faithfully

David Boyd
Senior Planning Officer